

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

IN RE:

Jennifer & Israel R. McKinney
Debtors

Case Number

22-11558-13

NOTICE AND MOTION TO DISMISS

Standing Chapter 13 Trustee, Mark Harring brings on this motion and respectfully represents:

1. Debtors filed for relief under chapter 13 of the United States Bankruptcy Code on September 27, 2022.
2. The debtor has caused unreasonable delay that is prejudicial to creditors pursuant to 11 USC Sec. 1307(c)(1) by not providing the requested tax returns timely.

WHEREFORE your movant requests an order directing the dismissal of the above-captioned chapter 13 proceeding.

PLEASE TAKE NOTICE that you must object or request a hearing **on or before July 23, 2024** if you wish to contest this motion. Any objection or request for hearing that you file must be filed with the court at the address listed below. An objection or request for hearing should set forth grounds to support the objection request. If no objection or request for hearing is filed, the court shall grant the motion without a hearing and the case will be dismissed.

Dated: July 2, 2024

/s/ Mark Harring
Standing Chapter 13 Trustee

The Court's Address is:

United States Bankruptcy Court
120 N Henry
Room 340
Madison, WI 53703-2559

This copy of notice sent to:

United States Bankruptcy Court
120 N Henry
Room 340
Madison, WI 53703-2559

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CERTIFICATE OF SERVICE

I, Elizabeth Brady, state that on July 2, 2024 I deposited in the U.S. Mail a true and correct copy of the notice and motion for dismissal to the following listed parties in envelopes with return addresses in case of non-delivery, unless parties are served via the CM/ECF System sponsored by the Court.

United States Bankruptcy Court
120 N Henry
Room 340
Madison, WI 53703-2559

ATTORNEY GREG P. PITTMAN
PITTMAN & PITTMAN LAW OFFICES
712 MAIN STREET
LA CROSSE, WI 54601

Jennifer McKinney
316 4th St S
La Crosse WI 54601-4021

Israel R. McKinney
916 Tyler Street
La Crosse WI 54601

I certify under penalty of perjury that the foregoing is true and correct

/s/ Elizabeth Brady
Office of the Standing Chapter 13 Trustee